

January 30, 2007

The Honorable Valerie Woodruff
Secretary of Education
401 Federal Street
Dover, DE 19901

RE: 10 DE Reg. 1147 [Final Teacher of Students with Visual Impairments Regulations]

Dear Secretary Woodruff:

The State Council for Persons with Disabilities (SCPD) has reviewed the Professional Standards Board's [in collaboration with the Department of Education (DOE)], final Teacher of Students with Visual Impairments regulations published as 10 DE Reg. 1147 in the January 1, 2007 issue of the Register of Regulations. SCPD commented on the proposed version of these regulations in October 2006 and truly appreciates that final standards have now been adopted incorporating revisions recommended by the Council.

First, the Councils noted that the proposed standards made Braille instruction optional, contrary to Title 14 Del.C. §206(d). In response, the final regulations were amended to require applicants for a standard certificate to have training in both Braille and the "Nemeth Code". SCPD understands that the Nemeth Code is a format/symbol system used to communicate math, chemistry, and science information which is different from standard literary Braille.

Second, the Councils recommended adoption of "people-first" language (e.g. referring to "teacher of students with visual impairments" rather than "teacher of the visually impaired"). The title of the regulations and Sections 1.0 and 3.0 were amended to reflect "people-first" language.

The Councils would also like to note a minor oversight in Section 3.0. Instead of referring to Title 14 Del.C. §206(d), Section 3.0 refers to "Del.C. §206(d)". The citation is therefore incomplete.

Again, thank you for effecting amendments consistent with Council commentary.

Sincerely,

Daniese McMullin-Powell, Chairperson
State Council for Persons with Disabilities

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